

RRTF

Rodenticide Registrants Task Force

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Via E-Mail

Debra F. Edwards, Ph.D.
Director
Special Review and Reregistration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Mail Code: 7508P
Washington, D.C. 20460

Re: RRTF Product Stewardship Proposal

Dear Dr. Edwards:

On behalf of the Rodenticide Registrants Task Force (RRTF), I am pleased to enclose the RRTF's Product Stewardship Proposal for your consideration. This Proposal stems from the very productive meeting representatives of the RRTF had with you and your colleagues on June 1, 2006, during which we discussed product enhancement suggestions. At that time, you invited the RRTF to submit a "stewardship package," so that the U.S. Environmental Protection Agency (EPA) could consider it as it prepares to release a draft mitigation decision for rodenticides in September 2006.

The Product Stewardship Proposal is directed at three stewardship areas, including consumer label enhancements, a communication/education campaign (which entails creating both a point of sale communication document and a website), and reducing the amount of bait in placements. The RRTF looks forward to working with EPA to implement the Proposal.

Sincerely,

John L. Hott

John L. Hott, Ph.D.
Chair

Attachment

cc: Rodenticide Registrants Task Force (w/attachment) (via e-mail)
Lynn L. Bergeson, Esquire (w/attachment) (via e-mail)
David B. Fischer, Esquire (w/attachment) (via e-mail)

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Proposal

The Rodenticide Registrants Task Force (RRTF) is pleased to submit this proposal to enhance the stewarding of our member companies' rodenticide products. Member companies of the RRTF include Bacon Products, Inc., Bell Laboratories, Inc., Farnam Companies, Inc., LiphaTech, Inc., Neogen Corporation, Reckitt Benckiser, Inc., and Syngenta Crop Protection Inc. RRTF member companies remain committed to continuing to work with the U.S. Environmental Protection Agency (EPA), the California Department of Pesticide Regulation (DPR), and other interested stakeholders to ensure that our rodenticide products are used safely and effectively.

Background

The RRTF was formed in late 1998 following the release of the draft Rodenticide Cluster Reregistration Eligibility Decision (RED). RRTF member companies consist of technical and end-use registrants of rodenticide products. Since its inception, the RRTF has been a contributing participant in multiple forums, including the Rodenticide Stakeholders Workgroup (RSW). Despite fundamental disagreements in interpreting the available scientific and technical assessments of anticoagulant rodenticides, the RRTF remains committed to assist EPA in constructively reducing exposure to rodenticides and enhancing the public's understanding of the appropriate use of our member companies' rodenticide products to ensure they provide the many public health benefits that they offer.

Labeling enhancements has been one area of particular focus for the RRTF. Through these enhancements, consumers will more readily access information on how best to handle, use, and dispose of rodenticide products. Although EPA has expressed interest in advancing these enhancements, to date, progress has been hampered by other EPA priorities. Nonetheless, the RRTF remains eager to pursue labeling enhancements and other product stewardship initiatives, in an effort to inform EPA's anticipated draft risk mitigation decision for rodenticides.

DPR has also expressed interest in various potential rodenticide mitigation measures. In its April 27, 2006, letter to DPR, the RRTF committed to work with DPR to identify appropriate and useful measures to ensure that RRTF member companies' rodenticide products are used safely and effectively. In particular, the RRTF remains ready to work actively with DPR in preparing a point of sale communication document.

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Product Stewardship Initiatives

Rodenticides provide a critical public health benefit by controlling rodents that are well-known disease vectors. Rodenticides also provide a less recognized ecological benefit by successfully promoting species conservation through island rodent eradication efforts. To help ensure that rodenticides continue to serve their beneficial roles both safely and effectively, the RRTF offers the following product stewardship initiatives:

- **Consumer Label Enhancements** -- Rodenticide product labels can be confusing because the information provided is often complex and not “user-friendly.” EPA’s Consumer Labeling Initiative (CLI), launched in 1996, provided invaluable information regarding how best to improve labels to enable consumers to locate quickly essential information on the safe handling, use, and disposal of consumer products. EPA has already implemented elements of that program in Pesticide Registration (PR) Notice 2001-1 (First Aid Statements on Pesticide Product Labels) and PR Notice 2001-6 (Disposal Instructions on Non-Antimicrobial Residential/Household Use Pesticide Product Labels). CLI’s research findings can be brought to bear on creating and implementing labeling enhancements for anticoagulant rodenticide product sizes of one (1) pound or less, the product package size of products typically purchased by consumers. These enhancements, in particular, will more demonstrably emphasize the need to use products properly to minimize potential exposure of children, companion animals, and wildlife. In light of the considerable work that has already gone into this initiative to date, the RRTF is eager to move the process along to bring simplified consumer labels to the shelf as expeditiously as possible.
- **Communication/Education Campaign** -- We envision two components to this activity, as outlined below.
 - **Point of Sale Communication Document** -- As part of the initiative to enhance product labels, the RRTF would like to partner with EPA and DPR in developing a point of sale communication document. This document would reinforce and underscore the information on the enhanced product labels discussed above. Additionally, the RRTF envisions the document addressing the following elements:

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- Integrated Pest Management practices (prevention, when to use mechanical means versus chemical means, etc.);
 - Proper usage of products to prevent exposure;
 - Proper disposal of unused products; and
 - Bi-lingual text.
- **Rodenticide Website** -- The industry will develop a website that incorporates the elements of the point of sale document, as well as other useful information targeted at consumer audiences. The website may offer more opportunity to incorporate useful information intended for consumers that will not be feasible to include in the point of sale document, such as:
- Links to EPA, DPR, and other helpful sites;
 - Additional information on the public health benefits of rodenticides;
 - Additional precautions to take to ensure rodenticide products are used as intended; and
 - Links to member company websites so visitors can access easily product label information, MSDSs, and related useful information.
- **Reducing the Amount of Bait in Placements** -- The RRTF is also interested in exploring the possibility of reducing the amount of bait consumers may use through either one of two methods. A company may choose to reduce the amount of bait in each place package or it may choose to reduce the number of packages recommended for rodent control. As there are already varying sizes of place packages and use directions

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may differ based on the product, there needs to be latitude for each company to choose either direction while ensuring their product is efficacious. This action would result in bait usage reductions, with the intent of reducing the quantity of bait in homes and subsequent opportunity for reduction of chemicals in the environment. The RRTF believes that additional discussion between the RRTF and EPA on the specific parameters of this initiative can result in a positive step toward chemical use reduction. The RRTF is confident that these initiatives will benefit consumers and the environment through improved rodenticide product management activities.

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The RRTF looks forward to continuing to work with EPA to implement these initiatives, which collectively will enhance the utility and efficacy of our rodenticide products. The RRTF is hopeful that EPA's upcoming draft mitigation decision will present a renewed opportunity to pursue not only the label enhancements described above, but all of these proposed Product Stewardship Initiatives.